

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

First-Class Mail and Periodicals
Service Standard Changes, 2021

Docket No. N2021-1

PUBLIC REPRESENTATIVE FIRST INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE WITNESS
ROBERT CINTRON (USPS-T-1)

(May 19, 2021)

Pursuant to 39 C.F.R. §§ 3020.117 and 3020.188, the Public Representative
hereby submits the following interrogatories and requests for production of documents.

Respectfully Submitted,
/s/ Samuel Poole
Samuel Poole
Public Representative for
Docket No. N2021-1

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1. Please refer to page 10, lines 7-10 and 13-15, of witness Cintron's testimony. Witness Cintron states that "current average utilization of surface transportation capacity is 42 percent" and that "the surface transportation network has ample existing capacity to absorb volume from air transportation[.]" Witness Cintron further states that "through improved surface transportation capacity utilization and consolidation, we expect to require fewer surface transportation trips over a given period than we currently require."
 - a. Please provide documentation on the average utilization of surface transportation capacity for Fiscal Year (FY) 2020, FY 2019, FY 2018, FY 2017, and FY 2016.
 - b. Please discuss any previous initiatives that the Postal Service has pursued to optimize capacity utilization of its surface transportation network and the impacts of and obstacles encountered with regard to those initiatives.
 - c. Please explain why, or why not, these obstacles will limit the Postal Service's attempts to optimize the surface transportation network in connection with the proposed service changes.
 - d. Please explain the degree to which the current surface transportation utilization rate is a function of the current service standards.
2. Given the nature and scope of this request, please confirm that the Postal Service conducted operational or pilot testing of the proposed service standard changes.
 - a. If confirmed, please explain in detail the nature and extent of the Postal Service's testing, including, but not limited to, dates, scope, and results of any testing.
 - b. If not confirmed, please explain whether the Postal Service considered such testing and any reason(s) why testing was considered unnecessary or otherwise not pursued.
3. Please refer to page 30, lines 18-20, of witness Cintron's testimony. Witness Cintron's testimony states that the Postal Service "has carefully considered

impacts of the proposed changes to relevant stakeholders and measures to mitigate those impacts.”

- a. Please explain how the Postal Service has evaluated the impact of presort mailers who may opt to dropship their mailpieces further downstream to avoid service disruption so that their customers can get their mail in time.
 - b. Please confirm whether the Postal Service has considered a dropship discount. If confirmed, please provide:
 - i. An estimated discount;
 - ii. An explanation of how it was derived;
 - iii. And any potential cost/revenue impacts.
 - c. Please refer to question 1, above. Please confirm that the Postal Service has considered that dropship mailers may change their mailing patterns in response to the proposed change and how that might result in surface transportation continuing to be underutilized.
 - i. If confirmed, please explain any additional measures in consideration to ameliorate underutilization.
 - ii. If not confirmed, please explain why the Postal Service does not believe these behaviors are likely to change, or why these behaviors are unlikely to affect utilization of the surface transportation network.
4. Please refer to pages 22-23, lines 14 and 1, of witness Cintron’s testimony. Witness Cintron states that “[i]n very isolated cases, mail is also transported by barge, hovercraft, snowcat, rail, and mule.”
 - a. Has the Postal Service considered rail transportation as an alternative mode of surface transportation? If not, please explain why not.
 - b. What efforts has the Postal Service made to evaluate the strategic advantages of utilizing rail transportation as a component of its surface transportation network?